

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Todd **KREISLER**,

Plaintiff,

v.

Kais **ABID**,  
*d/b/a PAPA JOHN'S*;  
**PARKER EAST 24TH APARTMENTS LLC**,  
*A New York Limited Liability Company*;  
**305 EAST 24TH OWNERS CORP.**,  
*A New York Corporation*

Defendants.

**12 civ. 4052 (PAE)**

**RULE 26(a)(1)  
DISCLOSURE**

Defendant, Kais **ABID**, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, hereby provides the following:

**Individuals likely to have discoverable information:**

(1). Kais Abid, Defendant. Contact him at 21 Maiden Lane, Apt. 8C, New York, New York 10038. Upon information and belief, Mr. Abid has information pertaining to Papa John's, the space in question, and allegations in the complaint pertaining to accessibility and the current use of the subject property.

(2) Defendant's Expert. Defendant, Kais Abid, has retained the services of Restaurant Operations Institute, Inc. (ROI) located at 60 Chelsea Corners, #201, Chelsea, Alabama. The company has not as of yet examined the subject premises. Defendant Kais Abid reserves the right to retain, exchange, and utilize experts in accordance with the Federal Rules of Civil Procedure.

**Documents, data, and/or tangible things to support claims or defenses:**

The Defendant, Kais Abid, will produce responsive documents at a later date under separate cover.

**Computation of Damages:**

The Defendant, Kais Abid, has not made a claim for damages.

**Applicable Insurance Agreement:**

Defendant is insured by Seneca Insurance Company, Inc. under Policy No. BOP 501 8735. This company is located at 160 Water Street, 16<sup>th</sup> Floor, New York, New York 10038

The Defendant, Kais Abid, reserves the right to amend or supplement the above response at any time up to and including the time of trial.

Dated: Fort Lee, New Jersey  
January 24, 2013

**Law Firm of Barry N. Frank & Associates PC**  
*Attorneys for the Defendant, Kais Abid*

BY: \_\_\_\_\_/s/ Barry N. Frank, Esq.  
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